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### **REMARKS**

In response to the Non-Final Office Action mailed March 7, 2006 (hereinafter "Office Action"), claims 24-36 have been newly added. Therefore, claims 1-18 and 24-36 are pending. Support for the instant amendments is provided throughout the as-filed Specification. Thus, no new matter has been added. In view of the foregoing amendments and following comments, allowance of all the claims pending in the application is respectfully requested.

### **INFORMATION DISCLOSURE STATEMENT**

Applicants are submitting herewith a Supplemental Information Disclosure Statement and respectfully request that the Examiner consider the cited references and provide a signed copy of the Form PTO-1449 for this submission with the next Office Action.

### **ALLOWED CLAIM 23 & NEW CLAIMS 24-36**

Applicants acknowledge with appreciation the indication that independent claim 23 is allowed [Office Action, pg. 5, ¶ 3]. Newly added claims 24-29 depend from allowed claim 23 and are allowable for *at least* this reason, as well as for the further features they recite.

Applicants submit that newly added claim 30 is allowable as it is an independent system claim that corresponds to (and recites the features of) allowed claim 23. Newly added claims 31-36 depend from claim 30 and are allowable for *at least* this reason, as well as for the further features they recite.

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### **REJECTIONS UNDER 35 U.S.C. § 102**

Claims 1-18 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,507,817 to Wolfe *et al.* ("Wolfe") [Office Action, pg. 2, ¶2]. Applicants traverse this rejection for at least the reason that Wolfe neither explicitly nor impliedly discloses each of the elements of claims 1-18. "A prior art reference anticipates a patent claim if the reference discloses, either expressly or inherently, all of the limitations of the claim." *Metabolite Laboratories, Inc. v. Laboratory Corporation of America Holdings*, 370 F.3d 1354, 1367, 71 U.S.P.Q. 2d (BNA) 1081, 1090 (Fed. Cir. 2004) (quoting *EMI Group N. Am., Inc. v. Cypress Semiconductor Corp.*, 268 F.3d 1342, 1350, 60 U.S.P.Q. 2d (BNA) 1423, 1429 (Fed. Cir. 2001) (citation omitted)).

#### **A. Independent Claims 1 and 10.**

Independent claims 1 and 10 recite, *inter alia*, the features of:

...initiate (claim 1) or initializing (claim 10) outbound voice-enabled communication to one or more subscribers using one or more of the markup documents; and,

...  
...accesses (claim 1) or accessing (claim 10) one or more of the markup documents for dynamically interacting with one or more subscribers of the at least one voice service, during either outbound or inbound voice-enabled communications, to enable the one or more subscribers to receive and respond to the voice service output information.

Wolfe does not appear to disclose *at least* these features. By contrast, Wolfe appears to disclose a voice IP approval system that comprises a web-based voice messaging system for enabling text-based forms to be retrieved and acted on via a telephone [Wolfe, *e.g.*,

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Abstract]. For example, a blank form (*e.g.*, vacation request, cell phone or pager purchase request, purchase order, capital expense request, *etc.*) may be retrieved from a forms database 124 and presented by a web server 64' to a browser 56' for data input by a submitting party (the party seeking approval). The submitting party completes the form and posts the completed form to web server 64' for storage in a data store 122 [Wolfe, *e.g.*, col. 5, lns. 60+].

While Wolfe does disclose initiating an outbound communication [Wolfe, *e.g.*, col. 6, lines 7-14], it appears as though the outbound communication is only a *notification* communication to an approving party, and not a communication wherein one or more of the markup documents are accessed for dynamically interacting with one or more subscribers of the at least one voice service... to enable the one or more subscribers to receive and respond to the voice service output information. In other words, Wolfe does not *appear* to disclose initiating an outbound communication to the subscriber (approver) to present the form to the subscriber once the submitting party posts the completed form to web server 64.' Rather, it appears as though the completed form is placed in data store 122 until an HTTP request from a subscriber is received:

With regard to form approval, the *application server 66 receives*, via the web server 64, *HTTP requests from either a PC-based web browser 56* capable of supplying full media content (*e.g.*, audio, text, images, and streaming video), *or a lightweight or proxy browser 62* configured for serving as an HTTP interface for a user input device, such as a telephone 18, having limited media capabilities (*e.g.*, audio only).

[Wolfe, col. 6, lns. 14-25, *emphasis added*].

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For *at least* this reason, Wolfe appears to neither explicitly nor impliedly disclose each of the features of at least independent claims 1 and 10. Accordingly, the rejection of independent claims 1 and 10 is improper and should be withdrawn.

B. Dependent Claims 2-9 and 11-18.

Dependent claims 2-9 and 11-18 are allowable because they depend from allowable independent claims 1 and 10, respectively, as well as for the further features they recite.

Dependent claims 9 and 18, for example, each recite that the markup documents comprise information accessed from an on-line analytical processing (OLAP) system. Wolfe clearly does not disclose an OLAP system. In the Office Action, at pg. 4, it appears as though the Examiner is relying on the LDAP directory and/or IMAP directory of Wolfe [*e.g.*, Wolfe, col. 6, lines 40-59] to be an OLAP system. Applicants disagree. The Examiner's interpretation of the LDAP directory and/or IMAP directory of Wolfe as an OLAP system is inconsistent with the separate meanings afforded to these terms by those having skill in the art.

As an *exemplary* illustration, Applicants have provided below the separate definitions of "LDAP" and "IMAP" as defined in Random House Webster's Computer & Internet Dictionary, Third Edition, ©1999 by Phillip E. Margolis:

**LDAP:**

Short for *Lightweight Directory Access Protocol*, a set of protocols for accessing information directories. LDAP is based on the standards contained within the X.500 standard, but is significantly simpler. And unlike X.500, LDAP supports TCP/IP, which is necessary for any type of Internet access. Because it's a simpler version of X.500, LDAP is sometimes called *X.500-lite*.

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**IMAP:**

Short for *Internet Message Access Protocol*, a protocol for retrieving e-mail messages. The latest version, *IMAP4*, is similar to POP3 but supports some additional features. For example, with IMAP4, you can search through your e-mail messages for keywords while the messages are still on the mail server. You can then choose which messages to download to your machine.

By contrast, OLAP (as understood by those having skill in the art -- and as disclosed and claimed by Applicants) enables uses to, among other things, analyze various dimensions of multidimensional data. OLAP is also often used in data mining. Accordingly, in view of the accepted, separate meanings of "LDAP," "IMAP," and "OLAP," the Examiner's rejection is flawed. For *at least* this reason, the rejection of dependent claims 9 and 18 is improper and should be withdrawn.

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**CONCLUSION**

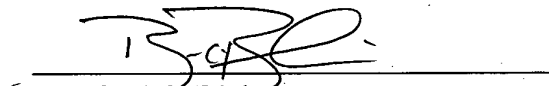
Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Date: June 5, 2006

Respectfully submitted,

By:

  
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